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January 12, 2022

VIA ECF

The Honorable Cynthia M. Rufe
United States District Court for the
Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Suite 12614
Philadelphia, PA 19106-1797

Re: *In re Generic Pharmaceutical Antitrust Litig.*, MDL No. 16-md-2724 (E.D. Pa.),
DOJ's Motion to Stay Discovery

Dear Judge Rufe:

I write on behalf of Defendant Ara Aprahamian to correct certain statements in Plaintiffs' Memorandum in Opposition to DOJ's Motion to Stay Discovery (Dkt. 1918). In their Memorandum, Plaintiffs incorrectly assert that "Mr. Aprahamian has different lead counsel in his criminal case (Alexandra Shapiro) than he does in his civil case (George Robert Gage)." (*Id.* at 8). To be clear, I am lead counsel for Mr. Aprahamian in both proceedings, as Mr. Aprahamian has explained in a prior court filing.¹ I have been lead counsel in both since their inception, including before indictment in the criminal matter, and will be lead counsel at trial. Consequently, Plaintiffs' suggestion that I could be walled off from either proceeding is impossible as a practical matter and would, among other things, violate Mr. Aprahamian's Sixth Amendment right to counsel of choice.

Respectfully submitted,

/s/ G. Robert Gage, Jr.

G. Robert Gage, Jr.

¹ See Reply Memorandum in Support of Defendant Ara Aprahamian's Motion to Stay All Civil Proceedings Against Him (Dkt. 1585) at 6 (explaining that "one [of the firms representing Mr. Aprahamian] is lead trial counsel (in both cases)" (namely, my firm) and "one specializes more in motions and appeals" (Ms. Shapiro's firm)).